

ATTACHMENT A

June 4, 2015

Ms. Christina Morgan
Tennessee Dept. of Environment & Conservation
Division of Water Resources-Water Pollution Control
Enforcement and Compliance Section
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 11th floor
Nashville, TN 37243

Subject: NPDES Permit TN 0001830 - May 2015 DMR's – Outfall 001G and SW2-G

Dear Ms. Morgan:

Please accept this Attachment A as a comment to the reported pH value for Outfall SW2-G Discharge Monitoring Report for 5/1/15 through 5/31/15.

The reported maximum pH value for Outfall SW2-G was 9.32 s.u. The pH permit limit range for Outfall SW2-G is 6.0 to 9.0 s.u. The cause of the high pH value has been investigated. The investigation included an examination of the existing stormwater flow, the flow from the old quarry, the stormwater flow from Signal Mountain, and the stormwater flow from the plant.

As you know, in 2012 a project was completed during which stormwater flow from the old quarry pond northeast of Outfall SW2-G was diverted to Pond 2, which ultimately discharges through Outfall 001. This flow included much of the stormwater flow from Signal Mountain and the old quarry. It did not include flow from Suck Creek Road southwest of the old quarry nor did it include flow from property directly north of the Outfall which discharges to a drainage pipe leading under the road to Outfall SW2.

Recently we had an issue wherein the stormwater flow channeled into the drainage system became plugged and overflowed the capacity of our system. As a result, we shut the slide gate permitting flow from the quarry pond to the wastewater treatment system and, instead, the flow was discharged to Outfall SW2-G. The slide gate was still in a "closed" position during the rain events of May 25th/26th. We have since cleaned out the stormwater drainage system completely, using both internal and external sources (Roto-Rooter).

The pH value reported from the sample obtained from SW2-G on the morning of May 26th reflects stormwater that was sampled immediately after a rain event that occurred after several weeks of very little rain (from 5/1 through 5/24/15 there was just 0.76 inches of rain, and then on 5/25 there was 1.06" and on 5/26 there was 0.32". We believe that the 5/25/15 rain event kicked up a lot of materials that were high in pH, such as fertilizer and soils, many of them washed off of Signal Mountain, Suck Creek Road, and vehicles traveling along the roadway, as well as homes far to the north of the stormwater outfall and the old quarry pond.

No corrective action is being proposed at this time, as the significant stormwater that was flowing through Outfall SW2-G appears to have stopped completely – at least for now. This is the first time in several months where there has been no flow through Outfall SW2-G. As you are aware, a corrective action plan was implemented back in 2012, which resulted in the construction of a diversion structure that permits stormwater flow from the quarry pond to either Outfall SW2-G or to the plant



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settling ponds and ultimately to Outfall 001-G. Until such time that the significant flow of water from Signal Mountain and elsewhere commences again, it is our hope that this issue has been closed.

If you have any questions, please feel free to contact me at 423-886-0845 or laura.macpherson@buzziunicemusa.com.

Respectfully,

A handwritten signature in black ink, appearing to read 'Laura Macpherson'.

Laura Macpherson
Environmental Engineer
Signal Mountain Cement Company, d/b/a Buzzi Unicem USA

LM

cc: CHATTANOOGA EFO
TDEC Division of Water Resources
1301 Riverfront Parkway
Suite # 206
Chattanooga, TN 37402

Mr. David Puzan, Plant Manager, Buzzi Unicem USA
Mr. Adam Swercheck, Buzzi Unicem USA
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